

Submission for the Draft Poultry Australian Animal Welfare Standards and Guidelines

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SECTION 10 - Humane Killing	Comment
SA 10.1	Should refer to immediate loss of consciousness or the induction of unconsciousness without pain/distress. Simply referring to 'loss of consciousness' is not adequate. 'Rapid death' also requires definition.
SA 10.2	Should also refer to competency (for consistency with SA1.2). Where a competent person is not available and the bird is suffering, the method/technique used still needs to meet SA 10.1 (ie. immediate loss of consciousness/death). Definition of 'unreasonable delay' is required.
SA 10.3	Definition of 'reasonable opportunity'
SA 10.4	Remove the word 'reasonable'. Person killing or the supervisor of the person killing (if they are not deemed competent).
Additional comments on standards	Consider including unacceptable methods within the standards (not the guidelines).
GA 10.1	For both killing of individual birds and whole flock destruction (emergency or depopulation).
GA 10.2	<p>This section needs to differentiate between methods that cause death (while the bird is unconscious) and those that result in a stun only and therefore need to be followed by a killing method.</p> <ul style="list-style-type: none"> - <i>cervical dislocation or decapitation for poultry less than 6kgs</i> – Why is decapitation without prior stunning permitted for poultry less than 6kg but not for poultry over 6kg? Cervical dislocation which breaks the neck by stretching (rather than crushing) has shown to be more effective, though it is still associated with welfare concerns. The most significant being that it does not result in immediate unconsciousness in the majority of birds. EU regulation specifies a maximum live weight of 5kg and also places limits on the total number of birds that can be killed using this method. - <i>stunning by blunt trauma followed by decapitation or bleeding out for poultry over 6kgs</i> - <i>electrical stunning</i> – Head-only or waterbath stunning - <i>gas using carbon dioxide or a mixture of inert gases</i> – Basic parameters need to be included - <i>captive bolt</i> – This should include reference to a percussive device (ie applies a controlled blow to the head but does not penetrate). Many people associate the term captive bolt with a penetrative device. - <i>firearm</i> - <i>immediate fragmentation/maceration for unhatched eggs and day-old chicks.</i>
GA 10.3	Where is this figure from? What is more important is that when CO2 (or a mixture of CO2 and inert gases) is used the birds are placed initially into a concentration of

	no more than 40% CO2 until they are unconscious (assessed by looking for initial collapse of the bird).
GA 10.4	Concentrations of above 40% are painful and aversive. Lower concentrations should be used until the bird is deemed to be unconscious.
GA 10.5	These methods should be classed as unacceptable within the standards section.
GA 10.6	Is it assumed that this check comes after the killing method (when the method of producing unconsciousness does not result in the death of the bird), for example, after neck cutting. These assessment criteria are not valid for all stunning methods, though can be used to assess death. Definition of 'deliberate movement' is required so that it does not get confused with 'movement' <i>per se</i> .
GA 10.7	Should state 'both carotid arteries' rather than main blood vessels.
Additional comments on the guidelines	There are no guidelines on the assessment of unconsciousness. It is important that birds can be assessed as 'unconscious' before exsanguination/decapitation.

SECTION 11- Slaughtering establishments	Comment
SA 11.1	Live shackling would not meet this standard, ie. it does not minimise handling and stress.
SA 11.2	Should refer to immediate loss of consciousness (or the induction of unconsciousness without pain/distress - to allow for CAS). List of approved methods, particularly for unusual species etc ostrich/emu
SA 11.3	Must ensure that it is clear that this does not include hanging them on a shackle line and putting them through the system.
SA 11.4	<i>A person must ensure that devices which use blunt force to the head, pinch or crush the spinal cord are not used to stun poultry.</i> – This requirement needs to be completely changed. Devices that apply a percussive blow to the head are extremely effective, for example the CASH poultry killing device (Hewitt, 2000). Agree that devices which 'pinch and crush' the spinal cord must not be used, though this requires clarification to ensure people understand the type of device that would fall into this category.
SA 11.5	Is this for individual birds that are ineffectively stunned or in the event of a line breakdown?
SA 11.6	Definition of 'extended delay'
SA 11.7	Reference to animal-based assessment – ie monitored for signs of heat stress
SA 11.8	Stunning and slaughter. Monitoring the efficacy of neck cutting is important. Dead before they enter the scald tank is important, however this clause must also reiterate the requirement to ensure that birds are dead before recovering consciousness.
Additional comments on standards	Consider including additional unacceptable methods within the standards (not the guidelines).
GA 11.1	What is adequate ventilation? How is it determined? Animal-based measures ie. assessment of signs of heat stress

GA 11.2	What does checked for 'welfare' mean? This is not clear and would lead to a range of interpretations, some of which would not improve welfare during holding.
GA 11.3	Not just a contingency for 'stunning', but any breakdown/emergency that leads to delay to processing
GA 11.4	Covered by SA11.7 – Misting systems should be used with caution as they do not always enable birds to adequately dissipate heat due to the increase in relative humidity.
GA 11.5	This is impossible to achieve without changing the whole shackle line in some processing plants. Shackle lines are designed to fit tightly to improve conductivity. Birds are processed 'as hatched', therefore one size would not fit all birds.
GA 11.6	Definition of 'short time'. Maximum time should be stipulated in the standards. Research has shown that when shackling is performed properly, chickens only require around 10-15 seconds to settle. Need to emphasise that this requirement relates to conscious birds prior to stunning.
GA 11.7	More important that lighting is uniform from shackling to stunning, rather than the light level <i>per se</i> .
GA 11.8	Breast comforter should be from the 'start' of the shackling point not the end and up to the point that the bird enters the waterbath. Birds need to maintain contact with the breast comforter along the entire length. Birds also need to be kept free from obstructions.
GA 11.9	3 minutes hanging time is very long, particularly for heavier birds such as turkeys. This should be reviewed and reduced, particularly as it is a guideline and therefore should be encouraging best practice. No times stipulated for other poultry.
GA 11.10	Pre-stun shocks can also be a consequence of shackle line design and wing flapping activity.
GA 11.11	<p>Effective electrical waterbath operation is essential and due to the fact that animal-based outcomes cannot always be used to assess effective electrical stunning in poultry, system parameters that result in effective stunning need to be covered by the standards.</p> <p><i>'Correct immersion of the birds in the water ramp'</i> – This does not make sense and should refer to immersion of the head of each bird.</p> <p>The required voltage and resulting current is dependent on the resistance of each bird and is not significantly influenced by bird age and size (unless these factors reduce the resistance of the leg/shackle interface. What is more important is ensuring that both legs are placed in the correct position on the shackle. The role of electrical frequency in producing an effective stun also needs to be considered. Minimum currents per bird at different frequencies should be included in the guidance.</p>
GA 11.12	What about tipping systems for electrical stunning? This guidance is not just applicable to gas.
GA 11.13	The correct concentration for what? Most systems work on a rising or staged concentration of gas mixtures. Birds should be exposed to <40% CO ₂ until they are unconscious, before being moved into higher concentrations.
GA 11.14	To ensure that they are rendered unconscious (collapse) before they reach 40% CO ₂ (if CO ₂ is being used).

GA 11.15	Bleeding of poultry should also refer to cutting both carotid arteries and not just total bleed time. Bleed times for other poultry species not considered in the document.
Additional comments on guidelines	Should mention need to reduce disturbance and wing flapping activity. The processing section is not detailed enough and needs to contain additional standards and guidelines on stunning equipment parameters etc. Essential parameters for other stunning methods (eg captive bolt, head-only electrical stunning) needs to be included.